

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION**

NORCAL TEA PARTY PATRIOTS, et al.,)	
ON BEHALF OF THEMSELVES,)	
THEIR MEMBERS, and THE CLASS)	
THEY REPRESENT,)	
)	Case No. 1:13-cv-00341
Plaintiffs,)	
)	
v.)	
)	Judge Michael R. Barrett
THE INTERNAL REVENUE SERVICE, et al.,)	
)	
Defendants.)	
_____)	

**PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs NorCal Tea Party Patriots, South Dakota Citizens for Liberty, Inc., Americans Against Oppressive Laws, Inc., Texas Patriots Tea Party, and San Angelo Tea Party (collectively, "Plaintiffs") hereby move the Court, pursuant to Federal Rule of Civil Procedure 23(e), for an Order:

1. Granting final approval of the proposed Settlement as set forth in the Settlement Agreement;
2. Entering final judgment on all claims asserted by Plaintiffs in accordance with the Settlement and which is binding on all class members;
3. Granting incentive awards to the Class Representatives in the amount of \$10,000 each;
4. Granting an award of attorneys' fees in the amount of \$1.75 million to partially reimburse Citizens for Self-Governance, the third-party funder, for the fees and expenses it has incurred in this matter;

5. Approving payment of the litigation expenses submitted by Class Counsel; and
6. Expressly reserving a decision on the Motions to Unseal the transcripts by Former Individual Defendants Lois Lerner and Holly Paz, which should be decided separately from the settlement of the class claims.

In support of their Motion, Plaintiffs incorporate by reference their Suggestions in Support of Motion for Final Approval, filed contemporaneously with this Motion. Plaintiffs will also submit a proposed order for the Court's consideration.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion for Final Approval of Class Action Settlement, including all requested relief with respect to the proposed settlement of this class action, and also grant them any other such relief as the Court deems appropriate.

Dated: June 26, 2018

Respectfully submitted,

GRAVES GARRETT, LLC

/s/ Edward D. Greim

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Class Counsel

Certificate of Service

The undersigned attorney hereby certifies that, on June 26, 2018, the foregoing document was served the Court's CM/ECF electronic notification system to all counsel of record.

/s/ Edward D. Greim
Attorney for Plaintiffs